

To: DeVaney, Rainie[rdevaney@mt.gov]
From: Rise, David
Sent: Mon 1/23/2017 4:55:42 PM
Subject: RE: PQR language

Thank you. I will draft up a paragraph generally describing the implementation and run it by you before putting it in the PQR report.

David Rise, Wastewater Unit

EPA Region 8 (8TMS-MU)

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(406) 457-5012

From: DeVaney, Rainie [mailto:rdevaney@mt.gov]
Sent: Monday, January 23, 2017 9:53 AM
To: Rise, David <rise.david@epa.gov>
Subject: RE: PQR language

DEQ Circular 12-B provides the foundation for implementing both individual and general variances from the base numeric nutrient criteria.

https://deq.mt.gov/Portals/112/Water/WQPB/Standards/PDF/NutrientRules/CircularDEQ12B_July2014

Some examples of the implementation details:

Create an Nutrient Standards Variance Request Form; so that permittee can apply for the variance

How does the general variance interact with TMDLs that include an approved

Wasteload Allocations

How does the general variance apply to new sources under MT's Nondegradation Policy

Large rivers and lakes without nutrient standards

Lagoons not designed to actively remove nutrients; which treatment systems does this apply to

Use of long term compliance schedules

DEQ has proactively worked internally and with EPA on these implementation details.

Rainie DeVaney

Surface Water Permitting Section Supervisor

Water Protection Bureau

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From: Rise, David [<mailto:rise.david@epa.gov>]

Sent: Monday, January 23, 2017 9:12 AM

To: DeVaney, Rainie

Subject: PQR language

Rainie;

This language about the general nutrient variance is in the PQR report draft. *"The variance is implemented in MPDES permits, and the MPDES Permitting Section has had to figure out the details of implementation."* Could you provide me some information on what you had to do to implement the general variance in the permits?

Thank you.

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